

EXHIBIT 1-G

Ex. G to Plaintiff's Motion to Extend filed 8-19-20

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GOBIND SINGH, M.D., PH.D.,)	
)	Civil Action No. 3:17-cv-00400
Plaintiff,)	
)	The Honorable Eli Richardson
v.)	
)	Magistrate Judge Barbara D. Holmes
VANDERBILT UNIVERSITY MEDICAL)	
CENTER, and VANDERBILT)	
UNIVERSITY,)	
)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF DR. GOBIND SINGH

I, Gobind Singh, under penalty of perjury, hereby declare and state as follows:

1. The email attached to the Motion to Extend Deadlines (Contested) as Exhibit D was exchanged between Justin Gilbert and I on June 8, 2020.
2. The text messages attached as Exhibit H to the Motion to Extend Deadlines (Contested) were exchanged between Jason Gilbert and I between April and June of 2020.
3. Justin Gilbert did not explain case deadlines to me. After January 3, 2019 he often stated that experts would be disclosed after the motion for summary judgment was decided.
4. At the mediation in this case, I learned that my damages claim for the lost salary of an ophthalmologist would be considered more persuasive if I had an expert. During the mediation I reached out to a prior lawyer I had retained, Jennifer Morton, who gave me the name of an economist that she had already spoken with in the past about my case, Dr. Charles Baum. I did not know until this time she had previously spoken to an expert. Dr. Baum prepared material that I used at the mediation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Gobind Singh 8/19/20
Gobind Singh

Executed on August 19, 2020, in New York, New York.